

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

EDWARD BRONSON and  
E-LIONHEART ASSOCIATES, LLC,  
d/b/a FAIRHILLS CAPITAL,

Defendants

- and -

FAIRHILLS CAPITAL, INC.

Relief Defendant.

Case No. 7:12-cv-06421-KMK

**NOTICE OF DEFENDANTS' MOTION FOR RELIEF FROM  
THE FINAL JUDGMENT FILED JUNE 8, 2017**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the papers, pleadings, and prior proceedings herein, Defendant Edward Bronson respectfully moves for the following relief: that this Court vacate its March 27, 2017 Order (ECF No. 178) of disgorgement, injunction from committing further violations of § 5 of the Securities Exchange Act of 1933, and injunction from trading in penny stocks pursuant to Federal Rule of Civil Procedure 60(b)(4), (5), and (6).

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Dated: November 22, 2021

Respectfully submitted,

/s/ Ryan D. O'Quinn  
Ryan D. O'Quinn (FBN: 513857)  
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Suite 2500  
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*Attorney for Defendant  
Edward Bronson*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this November 22, 2021, a true and correct copy of the foregoing was furnished by via CM/ECF upon all counsel of record and entitled parties.

/s/ Ryan D. O'Quinn  
Ryan D. O'Quinn